

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION

RICHARD L. CAMPBELL,

Plaintiff,

vs.

SHIRLEY TETER and SINCLAIR
COMMUNICATIONS, INC.

Defendants.

Case No. 1:17-cv-00129-MR-DLH

SHIRLEY TETER,

Plaintiff,

vs.

Case No. 1:17-cv-00256-MR-DLH

PROJECT VERITAS ACTION FUND
et al.,

Defendants.

DEFENDANTS' RULE 26(a)(1)(A) INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure,
Defendants Project Veritas Action Fund, Project Veritas, and James E. O'Keefe,
III make the following initial disclosures:

(1) Rule 26(a)(1)(A)(i) – Defendants identify the following individuals
likely to have discoverable information that the Defendants may use to support
their claims or defenses, unless the use would be solely for impeachment:

1. Shirley Teter

Ms. Teter's telephone number and address are unknown to Defendants. Ms. Teter has knowledge concerning her activities leading up to and following her altercation with Richard Campbell, including her interviews and publications concerning those events.

2. Christian Hartsock

Mr. Hartsock may only be contacted through the undersigned counsel. Mr. Hartsock has knowledge regarding Project Veritas Action Fund's news-gathering investigation into the political campaign activity of Democracy Partners, LLC ("Democracy Partners"), including but not limited to the campaign coordination between Democracy Partners and its subcontractor Americans United for Change, the Democratic National Committee, the Hillary For America Presidential Campaign and certain 501(c) organizations, which violated federal election laws barring such campaign coordination.

Mr. Hartsock also has knowledge of Project Veritas Action Fund's news-gathering investigation into Democracy Partners' and Americans United for Change's role in encouraging bird dogging and disruption at Donald Trump Presidential Campaign rallies, in the hopes of earning negative media attention for the Trump Campaign, including under-cover interviews of Americans United for Change operative Scott Foval. Additionally, Mr. Hartsock has knowledge of

Project Veritas Action Fund's constitutionally-protected news reporting on the results of the aforementioned journalism as reflected in Project Veritas Action Fund's "Rigging the Election" reports.

3. Brittney Rivera

Ms. Rivera ceased working for Project Veritas Action fund during early 2017 and her address and telephone number are unknown to Defendants. Ms. Rivera has knowledge regarding Project Veritas Action Fund's news-gathering investigation into the political campaign activity of Democracy Partners subcontractor Americans United for Change, including encouraging bird dogging and disruption at Donald Trump Presidential Campaign rallies, in the hopes of earning negative media attention for the Trump Campaign, including under-cover interviews of Americans United for Change operative Scott Foval. Additionally, Ms. Rivera has knowledge of Project Veritas Action Fund's constitutionally-protected news reporting on the results of the aforementioned journalism as reflected in Project Veritas Action Fund's "Rigging the Election" reports.

4. James O'Keefe

Mr. O'Keefe may only be contacted through the undersigned counsel. Mr. O'Keefe has knowledge regarding Project Veritas Action Fund's news-gathering investigation into the political campaign activity of Democracy Partners and its subcontractor Americans United for Change, including but not limited to the

campaign coordination between Democracy Partners, the Democratic National Committee, the Hillary For America Presidential Campaign and certain 501(c) organizations, which violated federal election laws barring such campaign coordination.

Mr. O'Keefe also has knowledge of Project Veritas Action Fund's news-gathering investigation into Democracy Partners' and Americans United for Change's role in encouraging bird dogging and disruption at Donald Trump Presidential Campaign rallies, in the hopes of earning negative media attention for the Trump Campaign. Additionally, Mr. O'Keefe has knowledge of Project Veritas Action Fund's constitutionally-protected news reporting on the results of the aforementioned journalism as reflected in Project Veritas Action Fund's "Rigging the Election" reports.

5. Robert Creamer
1101 Ridge Avenue
Evanston, IL 60202

Mr. Creamer's telephone number is unknown to Defendants. Mr. Creamer has knowledge regarding Democracy Partners, including but not limited to political campaign activity, the campaign coordination between Democracy Partners, the Democratic National Committee, the Hillary For America Presidential Campaign and certain 501(c) organizations, and Democracy Partners and Americans United for Change's role in encouraging bird dogging and disruption at Donald Trump

Presidential Campaign rallies. Mr. Creamer also has information about Democracy Partners' work with Americans United for Change and of the interviews conducted by Project Veritas Action Fund's journalists.

6. Scott Foval

Mr. Foval's address and telephone number are unknown to Defendants. Mr. Foval has knowledge regarding Democracy Partners, including but not limited to political campaign activity, the campaign coordination between Democracy Partners, the Democratic National Committee, the Hillary For America Presidential Campaign and certain 501(c) organizations, and Democracy Partners' and Americans United for Change's role in encouraging bird dogging and disruption at Donald Trump Presidential Campaign rallies. Mr. Foval also has information about Democracy Partners' work with Americans United for Change and of the interviews conducted by Project Veritas Action Fund's journalists.

7. Richard and Maxine Campbell

Mr. and Mrs. Campbell's telephone number and address are unknown to Defendants. Mr. and Mrs. Campbell have knowledge concerning the altercation initiated by Ms. Teter.

8. Representatives of MoveOn.org

The telephone number and address of MoveOn.org are unknown to Defendants. Upon information and belief, representatives of MoveOn.org have

knowledge concerning Ms. Teter's representations relating to the altercation she initiated with Mr. Campbell and her advocacy efforts following the altercation.

9. Representatives of Sinclair Communications, Inc.

Sinclair Communications, Inc. is a party to this consolidation action and may be contacted through its counsel. Upon information and belief, representatives of Sinclair Communication, Inc.'s affiliate WLOS have knowledge concerning Ms. Teter's representations relating to the altercation she initiated with Mr. Campbell and her advocacy efforts following the altercation.

10. Steve Eder and Jonathan Martin, The New York Times

The telephone number and address of Messrs. Eder and Martin are unknown to Defendants. Upon information and belief, Messrs. Eder and Martin have knowledge concerning Ms. Teter's representations relating to the altercation she initiated with Mr. Campbell and her advocacy efforts following the altercation.

11. Defendants incorporate by reference the identities of any witnesses disclosed by any other party to this consolidated action.

(2) Defendants identify the following categories of documents, electronically stored information, and tangible things that they have in their possession, custody, or control and may use to support their claims or defenses, unless the use would be solely for impeachment:

1. Project Veritas Action Fund's constitutionally-protected news reporting regarding Democracy Partners, Americans United for Change, and Shirley Teter that was published online.
2. Raw video footage recorded by Project Veritas Action Fund in its news-gathering investigation of Democracy Partners and Americans United for Change.
3. Internal e-mails and documents developed by Project Veritas Action Fund during its investigation of Democracy Partners and Americans United for Change.
4. Third-party news reports relating to Shirley Teter and published both before and after Project Veritas Action Fund published its reports.
5. Shirley Teter's advocacy letter published on MoveOn.org.
6. Video footage of Shirley Teter's altercation with Richard Campbell.

(3) Defendants are not seeking any damages in this action.

(4) Defendants are currently involved in a coverage dispute with their

insurer and will amend this response if coverage is confirmed.

Dated: April 25, 2018.



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CERTIFICATE OF SERVICE

This is to certify that on April 25, 2018, a copy of the foregoing Initial Disclosures was served via U.S. Mail to the following:

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